UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SARAH EDMONDSON, *et al.*

Plantiffs,

v.

Keith Raniere, *et al.*

Defendants.

Civil Action NO. 20-CV-485

Response to Plaintiffs' Opposition to Defendants' Motions to Dismiss

This is my second response to a non-specific complaint, which shows no specific connection between this made-up criminal enterprise and me.

As previously stated, I do not have sufficient resources to hire an attorney. Rather than pretending to be one, as Ms. Clyne pointed out in her last statement, I believe it would be more straightforward, honest, simple, and effective to merely point out the illogic and inconsistencies I see in the Plaintiffs' arguments and process in bringing this complaint forward. I'm confident that, in concert with the Judge's strong legal foundation, critical thinking skills, and moral-ethical discernment, it will be more than enough to determine basis for dismissal.

The Plaintiffs were given ample opportunity by Judge Komitee in our first status conference to amend the complaint and make it specific enough to hold some sort of weight. They chose to deny that opportunity. Though, they should have all the information necessary to do so, if some damage did, in fact, exist. Instead, they have continued to try to cobble together something specific enough to get this complaint to discovery. For these continued reasons, this complaint against me should be dismissed, and with prejudice.

The truth is if there was anything to complain about they would be able to specifically name it, with dates, times, from who, to whom, and what damage was done. They have not done so. Why? Because that information does not exist. Yet, they continue to ask for the opportunity to go to discovery. For what? To waste all of our time and resources in hopes that this masquerade will slide past the Judge's discernment and they will be awarded millions of dollars that do not belong to them?

It is clear that the Plaintiffs have little interest in me whatsoever in this proceeding, except to continue to try to feign a criminal enterprise that never existed. They mention my name so few times and show no clear evidence of my collaboration in any criminal enterprise - to which they are desperately trying to connect me, in order to justify their narrative and complaints. However, my inclusion in this lawsuit, though monetarily useless to them, is necessary so that their fake enterprise does not fall apart, and they will be permitted to go after Bronfman money.

The ties that bind this case together are weak, and they are about to unravel before your eyes in the coming weeks.

There is no enterprise:

Prior to June 19, 2012, it is expected that evidence will be filed in the criminal case of United States v. Raniere et. al., proving the abhorrent levels of corruption the FBI was willing to enact in order to convict innocent people and win their case. Of the many crimes and immoral tactics these publicly-appointed officials engaged in, most notably was there willingness to tamper with evidence in order to plant photos on the primary defendant's hard drive to establish an additional charge of child pornography. Without this charge, the defendants stood as a united

front – not one guilty plea. Once the group of Federal Agents colluded together to fabricate and import this charge, the 1st defendant, Ms. Nancy Salzman, decided to plead guilty. Coincidental?

This is just one of many horrifying and conscience-shocking acts that I expect you will read about in the coming legal filings for US vs. Raniere – the case the Plaintiffs are referencing to establish their fictitious "RICO enterprise."

If our Federal Agents, Prosecutors, and possibly, even Judge are willing to go to this length to win a case, using a RICO charge improperly, in order to gain legal flexibility so that they may fit their fictitious crimes into a more malleable and manipulatable standard is hardly unfathomable – and as you will see in the filings is, in fact, the case.

There is no criminal intent:

Not only was there no enterprise, but there was no criminal intent that I am aware of, or have ever been aware of in my experience with any and all of the companies, classes and schools I participated in since 2014. Though unconventional at times, the classes, and practices were all well thought out, and intentionally applied to our individual situations so that we may help ourselves reach a well-specified goal. Even if they were not as wisely thought out as they were, they certainly were all agreed upon by consenting adults.

There are no crimes: (at least none of the RICO magnitude, or none that I have seen solid evidence for):

If you examine for yourself, even rudimentarily, you will find the elements of the crimes – sex trafficking, forced labor, and the like – were not met. Rather hate, fear, prejudice, and social repugnance were used to win this case. Even the most petty of crimes they chased and terrorized these citizens with, in order to have their win are laughable. You cannot evade taxes using a credit card. How was this allowed? Unimaginable.

There are no valid guilty pleas:

In addition to the charges we see disintegrating before our eyes, the guilty pleas the Plaintiffs are using to substantiate the existence of said enterprise are invalid. In addition to the multiple crimes these Officials were willing to enact, they were also willing to terrorize innocent citizens into submission and cooperation. There is a formal affidavit that will likely be filed before aforementioned deadlines that I will draw your attention to, that outlines only a few of the disgusting examples of intimidation, force, and scare tactics these prosecutors were willing to inflict in order to 'find' their cooperating witnesses and crush the will of the standing defendants. The guilty pleas that were made were under duress, and therefore prove nothing but the fallible nature and character of humanity.

My Participation:

Let us hypothesize for a moment: even if there was some criminal enterprise that had been legitimately established, there certainly is no proof of my knowledge of it, my agreement to it, or my participation in committing crimes to hurt or deceive ANYONE in order to gain ANYTHING (Plaintiffs Combined Response in Opposition to Certain Defendants Motions to Dismiss the First Amended Complaint p.7). If the Plaintiffs, in their non-specific complaint, are insinuating that I intentionally deceived women to be branded as a sign of 'ownership' in a 'sex slave organization,' that is preposterous – there is no basis for it, and it is simply not true.

I was not convicted of any crimes.

I was not indicted for any crimes.

I was not even a target of The US Federal Governments investigation to indict the "conspirators."

If further evidence is needed, my rank in DOS was inferior to that of Sarah Edmonson's as evidenced by her "harboring of slaves" and my lack of doing so or building the organization (Figure 1 – [My] Defendants Motions to Dismiss Complaint 1_28_22), and it was FAR inferior to hers in 'NXIVIM' (or ESP). So, if this were some criminally intended conspiracy, Ms. Edmonson with her 11 year collaboration as a Green Sash Ranking, Board Member Appointment, and DOS 'slave-ship' downline should be being prosecuted far more aggressively than I. If this is not some sex-trafficking slave ring than these charges should have never existed in the first place. Which is it?

Despite these obvious facts, the Plaintiffs continue to try to paint me into this phantom family photo. They first try to degrade and defame my company, exo|eso™, pretending it had any other intent than to heal, empower, strengthen and improve the quality of life of all the hundreds of students that experienced it. They mention my role in exo|eso™, but with no specificity as to their claims. Forced labor… how? Sex-trafficking… really? The fact that they claim that professionals developing a wellness company that are choosing specific diets, exercising, and sleeping less (because they are excited about launching a new international venture) is somehow abnormal, is abnormal to me. To suggest these behaviors constitute "sex-trafficking" when sex was never even discussed, much less engaged in is, again, preposterous and defamatory.

Second, they try to say I was receiving some sort of unspecified "goodies" in exo|eso™, a company I helped to build from the ground up with my knowledge, experience, expertise, and sweat equity, because of my participation in DOS. What? This is not only false, but utterly insulting. What goodies? I worked for EVERYTHING I had built in exo|eso™. I earned my

place, my title, my partnerships, and my profits, as did the other ladies involved. They are not only insulting me, they are insulting and demeaning themselves, and the hard work they put in, in order to try to squee-nch some sort of material gain from an endeavor they failed to see through. That is not how reality works. Entrepreneurs work hard, they risk big. They either make it or they do not. They do not get to call themselves entrepreneurs or own a percentage of a company without that work and risk. You cannot come in as a responsible leader, partner, and contributor and then when it gets too hard and you quit, say you are entitled to be paid. That is pretending, blaming and, now, outright stealing.

The Plaintiffs' attempt to tie me in to this complaint through the branding process I helped with is also a feeble, and groundless, attempt. Again, it would require existence of some enterprise with criminal intent, that I knew about it, and that I conspired with them to do at least two crimes to forward our common goal - none of which is, true as illustrated above (*United States v. Phillips*, 664 F. 2d 971, 1011 (5th Cir. Unit B Dec. 1981), *cert. denied*, 457 U.S. 1136, 102 S. Ct. 1265, 73 L. Ed. 2d 1354 (1982)).

Lastly, the Plaintiffs point to my continued support of DOS, by my participation in The Dossier project, and my continued support of Keith Raniere, because of my participation in... I am not sure what. Let me be clear, I support the ideals that DOS was founded upon: agency, responsibility and service. I support due process. I support ONLY employing officials that are willing to do the job they were entrusted and paid to do, morally and correctly. If mistakes are made, that they fix them promptly. I support justice and truth. If these things are bad, go ahead and sue the pants off of me.

I do not support pedophilia. I do not support sex trafficking. I do not support forced labor or coercion. I do not support peonage or battery. I certainly do not support extorting people of

their hard earned careers, labor, money, relationships, reputations and the like, for your own personal and material interests. If you look closely at what I stand for in my life, and everything I have stood for, you will see no deviation. I am quite certain the Plaintiffs cannot say the same.

Their House of Cards:

The Plaintiffs you are currently entertaining in your legal home have been the gas fueling the legal debauchery you are now witnessing. This is only another extension of their empty claims, defamation, lies and extortion.

Ms. Sarah Edmondson herself was willing to lie on public television about her branding process in order to begin this narrative and attack my medical license. Videos in direct opposition are available.

Mr. Glazer was willing to falsify information and concoct a complaint specifically designed to pursue Bronfman money. I have reason to believe he knowingly and willingly changed facts in order to target their piggy bank. It is a well-known fact, especially by long-term leaders as high ranking as Sarah Edmondson and Mark Vicente (other lead Plaintiffs), that Sara Bronfman was not involved in the creation and establishment of Rainbow Cultural Garden or significantly involved in The Ethical Science Foundation after 2009. Why then, try to wrongfully involver her? The answer seems obvious to me. These are not the only deceitful behaviors there are evidence for, but they suffice to illustrate the incredulousness of their complaint.

Lastly, as stated in my first motion to dismiss, as well as the motions Ms. Clyne has written, I would like to highlight the ridiculous lengths the Plaintiffs are willing to go to try to convince others of this fantasy or, rather nightmare, that lives only in their minds. I refer to their Negligence per se claim (in Count III, Section 1595(a) claims based on violations of 18 U.S.C. § 1593A; and Counts VI, VIII and IX) – which they are now unopposed to dismissing (Foot note 5

- Plaintiffs Combined Response in Opposition to Certain Defendants Motions to Dismiss the First Amended Complaint). The primary plaintiffs in this case, Mark Vicente and Sarah Edmondson– who lead the LA and Vancouver centers – from which a large majority of all of these plaintiffs originate – were two of the highest ranking, most influential, highest paid, and informed participants, and collaborators there were. They were green sashes and members of the Board of ESP (in their speak NXVIM). They were suing me, Ms. Clyne, Mr. Porter, Ms. Clare Bronfman (all lower ranking members) for using tools of which I never earned the privilege of wielding (coaching or facilitating Explorations of Meaning (EMs) – but ironically, that they used on me – and THOUSANDS of others (my last motion: Defendants Motion to Dismiss Complaint 1.28.22 Figure 1). If the tools are bad we should be suing them. If the tools are good there is no damage and should be no complaint. This is very clear evidence of their litigious mentality.

There are still no clear, valid complaints against me, and the lengths these individuals are willing to go to hurt and extort money from others for their own personal gain is abhorrent.

There is no basis for my involvement in this complaint.

My arguments for rule 8, 9b, and 12(b) (6) remain and I corroborate, join, and incorporate the arguments for dismissal made by the other Defendants.

I humbly request that this complaint be dismissed with prejudice so that this extortive behavior cannot be repeated and I may start to put my time into more important endeavors to serve People. Thank you.

Respectfully submitted,

/s/ Danielle Roberts, DO, MS
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